

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

ROBERT MENENDEZ, *et al.*,

Defendants.

Criminal Action No. 23-490 (SHS)

Document Electronically Filed

NOTICE OF POST-TRIAL MOTIONS

PLEASE TAKE NOTICE that Defendant Wael Hana hereby moves before the Honorable Sidney H. Stein, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for the entry of an order acquitting Mr. Hana of his convictions under Counts 1, 2, 6, 7, 9, and 15 under Federal Rule of Criminal Procedure 29; or, in the alternative, for the entry of an order granting Mr. Hana a new trial under Federal Rule of Criminal Procedure 33; if the Court denies both of these motions for post-trial relief, Mr. Hana alternatively moves the Court to impose judgment on only one of two multiplicitous conspiracies charged under Counts 1 and 15.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendant Mr. Hana relies upon the accompanying Memorandum of Law in Support of Post-Trial Motions.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

Dated: August 19, 2024

Respectfully submitted,

s/ Lawrence S. Lustberg

Lawrence S. Lustberg

GIBBONS P.C.

One Gateway Center

Newark, New Jersey 07102

(973) 596-4500

llustberg@gibbonslaw.com

Attorney for Defendant Wael Hana